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18 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
19 and OTTOMOTTO LLC

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

22 WAYMO LLC,
23 Plaintiff,
24 v.
25 UBER TECHNOLOGIES, INC.,
26 OTTOMOTTO LLC; OTTO TRUCKING LLC,
27 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF CAMILA
TAPERNOUX IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS IN SUPPORT OF THEIR
MOTION TO QUASH AND MOTION
FOR PROTECTIVE ORDER
REGARDING SUBPOENAS TO YOO
AND GONZALEZ**

1 I, Camila Tapernoux, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendants' Administrative Motion to File Under Seal Exhibits in Support of their
6 Motion to Quash and Motion for Protective Order Regarding Subpoenas to Yoo and Gonzalez.

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1 to the Declaration of Arturo Gonzalez	Highlighted Portions	Non-parties Anthony Levandowski and Lior Ron
Exhibits 2-3 to the Declaration of Arturo Gonzalez	Entire Documents	Non-parties Anthony Levandowski and Lior Ron (Entire Documents) Defendants Uber and Ottomotto (Blue Highlighted Portions)

16 3. The blue-highlighted portions in Exhibits 2-3 contain the email addresses and
17 phone numbers of high-ranking company executives, whose contact information may become
18 compromised if disclosed to the public. Defendants seek to seal this information in order to
19 protect the privacy of these executives, as prominent individuals in this lawsuit are currently the
20 subject of extensive media coverage.

21 4. I understand that the yellow-highlighted portion in Exhibit 1 and the entireties of
22 Exhibits 2-3 to the Declaration of Arturo Gonzalez contain information relating to the Stroz
23 Report, which is currently the subject of several pending motions requesting a protective order
24 over this material. (Dkt. 1682, 1684, 1685, and 1686.)
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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 24th day of September, 2017 in San Francisco, California.

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4 /s/ Camila Tapernoux
Camila Tapernoux
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7 **ATTESTATION OF E-FILED SIGNATURE**

8 I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this
9 Declaration. In compliance with General Order 45, X.B., I hereby attest that Camila Tapernoux
10 has concurred in this filing.

11 Dated: September 24, 2017

12 /s/ Arturo J. Gonzalez
ARTURO J. GONZALEZ
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